

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

| | | |
|-------------------------------|---|-------------------|
| In re |) | |
| |) | |
| Candace Renee Hammond-Hopkins |) | |
| |) | No. 23-100001-BFK |
| Debtor. |) | Chapter 13 |
| <hr/> | | |

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY FILED BY VHDA
[DOCKET #37]**

COME NOW the Debtor, Candace Renee Hammond-Hopkins, by counsel, and responds as follows to the Motion for Relief from Stay filed by the Virginia Housing Development Authority.

1. Debtor admits the allegations of Paragraph 1.
2. Assuming that the word "filed" was omitted from Paragraph 2 after "Debtor," Debtor admits the allegations of Paragraph 2. Otherwise, ambiguous and therefor denied.
3. Debtor admits the allegations of Paragraph 3.
4. Debtor admits the allegations of Paragraph 4.
5. Debtor denies that the late Jacqueline Tillery is a co-owner; otherwise the allegations of Paragraph 5 are admitted.
6. [omitted in the motion]
7. Admitted, except that Debtor lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7, and therefore denies the same

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and demands strict proof thereof.

8. Debtor denies the allegations of Paragraph 8.

9. Debtor denies the allegations of Paragraph 9.

10. Debtor denies the allegations of Paragraph 10.

11. Debtor denies the allegations of Paragraph 11.

Debtor further denies each and every allegation not expressly admitted, and denies that Movant is entitled to the relief requested, or any relief.

Separate and Affirmative Defenses

1. Movant is adequately protected by an equity cushion.
2. Debtor has paid most of the alleged arrears and will pay the remaining amount promptly.
3. The property is necessary for an effective reorganization, and Debtor has equity in the Property.

Dated: February 18, 2025.

Respectfully submitted,

/s/ Daniel M. Press
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CERTIFICATE OF SERVICE

This is to certify that on this 18th day of February, 2025, I caused the foregoing Response to be served by CM/ECF upon the Movant, the Chapter 13 Trustee, and all creditors requesting such notice.

/s/ Daniel M. Press
Daniel M. Press